

# Exhibit 15

1 KEKER & VAN NEST LLP  
ROBERT A. VAN NEST - # 84065  
2 rvannest@kvn.com  
CHRISTA M. ANDERSON - # 184325  
3 canderson@kvn.com  
DANIEL PURCELL - # 191424  
4 dpurcell@kvn.com  
633 Battery Street  
5 San Francisco, CA 94111-1809  
Telephone: (415) 391-5400  
6 Facsimile: (415) 397-7188

7 KING & SPALDING LLP  
BRUCE W. BABER (pro hac vice)  
8 bbaber@kslaw.com  
1185 Avenue of the Americas  
9 New York, NY 10036  
Tel: (212) 556-2100  
10 Fax: (212) 556-2222

11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,

16 Plaintiffs,

17 v.

18 GOOGLE INC.,

19 Defendant.  
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Case No. CV 10-03561 WHA

**DEFENDANT GOOGLE INC.'S FOURTH  
AMENDED SUPPLEMENTAL INITIAL  
WITNESS DISCLOSURE STATEMENT**

Dept. Courtroom 8, 19<sup>th</sup> Fl.  
Judge: Hon. William Alsup

Defendant Google Inc. (“Google”) provides this Fourth Amended Supplemental Initial Witness Disclosure Statement pursuant to the parties’ agreement and pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure. This disclosure is intended to supplement (not replace or supersede) the previous witness disclosures served by Google in this matter, and all previous initial disclosures and trial disclosures made by Google are expressly incorporated herein by reference.

Google makes these disclosures based on its current knowledge, without the benefit of completed discovery in this action, and without waiver of attorney-client privilege, work product, common interest privilege, or any other privilege. Google’s investigations are continuing and Google expressly reserves the right to amend, modify, or supplement these disclosures in accordance with Rule 26, and the parties’ agreement, based on additional information obtained through formal discovery, continued investigation, or other means. Google further reserves the right to amend, modify, or supplement these disclosures depending on the number of depositions permitted in this matter, whether limited by agreement of the parties or by Court order. Google further reserves the right to assert any objections to discovery propounded in this matter, including in response to these disclosures, and reserves the right to object to depositions of any or all witnesses disclosed in these or prior pretrial or trial disclosures.

Subject to the foregoing, Google provides the following supplemental disclosure of witnesses in accordance with the parties’ agreement and in accordance with subsections (i) through (iv) of Rule 26(a)(1)(A):

Witness	Subject(s) of Information
Fred Chung (Contact through outside counsel for Google)	Google’s communications and relationship with Android application developers partners; the Android platform and applications
Mitali Dhar (Contact through outside counsel for Google)	Google’s communications and relationship with Android application developers partners; the Android platform and applications

Witness	Subject(s) of Information
<p>Anwar Ghuloum</p> <p>(Contact through outside counsel for Google)</p>	<p>Features, functionality, development, design and design alternatives for versions of Android, including but not limited to the use of the structure, sequence, organization and declarations of Java APIs in Android</p>
<p>Jon Gold</p> <p>(Contact through outside counsel for Google)</p>	<p>Financial information concerning Google operations that relate to Android, including but not limited to costs incurred by Google in connection with the design, development, and distribution of versions of Android</p>
<p>Urs Hoelzle</p> <p>(Contact through outside counsel for Google)</p>	<p>Google background, history and product development; Java background, history and development; and use of aspects of the Java platform, including but not limited to industry use or implementation of the Java APIs</p>
<p>Billy Rutledge</p> <p>(Contact through outside counsel for Google)</p>	<p>Google's communications and relationship with Android application developers partners; and the Android platform and applications</p>
<p>Reto Meier</p> <p>(Contact through outside counsel for Google)</p>	<p>Google's communications and relationship with Android application developers partners; and the Android platform and applications</p>
<p>Rick Cattell</p> <p>(Contact through outside counsel for Google)</p>	<p>Java, the Asserted Copyrights, the Asserted Works, the Java market, APIs, and issues related thereto.</p>
<p>Individuals with knowledge of Java history, background and development, including the use and implementation of the Java APIs, including but not limited to individuals who were disclosed, deposed, or testified in the first trial in this case.</p> <p>(Contact through counsel noted on prior disclosures)</p>	<p>Java history, background and development, including the use and implementation of the Java APIs</p>
<p>Any witnesses listed on Oracle's past, current, or future Rule 26 disclosures, trial witness disclosures, or any other disclosures that have been or will be served by Oracle, and any witness who has been or will be deposed in this matter, including without limitation: Edward Senteno, Donald Smith, David K. Hofert, Mike Ringhofer, Mark Wayne, Terrence Barr, Alan Brenner, Georges Saab, Henrik Stahl, Jim Kolotouros, Felix Lin, Anwar Ghuloum, Jon Gold, Urs Hoelzle, Billy Rutledge, Reto Meier,</p>	<p>Any subject matter on which the witness was designated and/or disclosed as well as any other subject matters about which the witness testified</p>

Witness	Subject(s) of Information
<p>and John Duimovich</p> <p>(Contact through counsel noted on prior disclosures and discovery materials)</p>	

Google further reserves the right to call any witnesses listed on Oracle's past, current, or future Rule 26 disclosures, trial witness disclosures, or any other disclosures that have been or will be served by Oracle, and any witness who has been or will be deposed in this matter.

Dated: January 27, 2016

KEKER & VAN NEST LLP

By: /s/ Robert A. Van Nest  
 ROBERT A. VAN NEST  
 CHRISTA M. ANDERSON  
 DANIEL PURCELL

Attorneys for Defendant  
 GOOGLE INC.

1 PROOF OF SERVICE

2 I am employed in the City and County of San Francisco, State of California in the office of a  
3 member of the bar of this court at whose direction the following service was made. I am over the  
4 age of eighteen years and not a party to the within action. My business address is Keker & Van  
Nest LLP, 633 Battery Street, San Francisco, CA 94111-1809.

5 On January 27, 2016, I served the following document(s):

6 **DEFENDANT GOOGLE'S FOURTH AMENDED SUPPLEMENTAL**  
7 **INITIAL WITNESS DISCLOSURE STATEMENT**

8 ☒ by **ELECTRONIC MAIL (PDF)**: Based on an agreement of the parties to accept service  
9 by electronic mail, I caused a true and correct copy of the foregoing document(s) to be sent  
10 to the person(s) at the electronic notification address(es) listed below. The email was  
transmitted without error.

11 ORRICK, HERRINGTON & SUTCLIFFE LLP  
12 KAREN G. JOHNSON-MCKEWAN (SBN 121570)  
kjohanson-mckewan@orrick.com  
13 ANNETTE L. HURST (SBN 148738)  
ahurst@orrick.com  
14 GABRIEL M. RAMSEY (SBN 209218)  
gramsey@orrick.com  
405 Howard Street, San Francisco, CA 94105  
15 Tel: 1.415.773.5700 / Fax: 1.415.773.5759  
PETER A. BICKS (*pro hac vice*)  
16 pbicks@orrick.com  
LISA T. SIMPSON (*pro hac vice*)  
17 lsimpson@orrick.com  
51 West 52nd Street, New York, NY 10019  
18 Tel: 1.212.506.5000 / Fax: 1.212.506.5151

Attorneys for Plaintiff  
ORACLE AMERICA, INC.

19 DAVID BOIES  
20 BOIES SCHILLER & FLEXNER LLP  
333 Main Street  
21 Armonk, NY 10504  
914-749-8201  
22 Fax: 914-749-8300  
Email: [dboies@bsfllp.com](mailto:dboies@bsfllp.com)

Attorneys for Plaintiff  
ORACLE AMERICA, INC.

24 STEVEN C. HOLTZMAN (SBN 144177)  
sholtzman@bsfllp.com  
1999 Harrison St., Ste. 900, Oakland, CA 94612  
25 Tel: 1.510.874.1000 / Fax: 1.510.874.1460

Attorneys for Plaintiff  
ORACLE AMERICA, INC.

27 [Oracle/Google@orrick.com](mailto:Oracle/Google@orrick.com)

Plaintiff's Counsel Service List

1 Executed on January 27, 2016, at San Francisco, California.

2 I declare under penalty of perjury under the laws of the State of California that the above is true  
3 and correct.

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5 /s/ Edward A. Bayley

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